

EXHIBIT 6

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Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 SPECTRUM DYNAMICS MEDICAL)
LIMITED,)

5 Plaintiff,)

6 vs.)

7 GENERAL ELECTRIC COMPANY, GE)
HEALTHCARE, INC., GE MEDICAL)
8 SYSTEMS ISRAEL LTD., JEAN-PAUL)
BOUHNIAK, SERGIO STEINFELD,)
9 ARIE ESHCO and NATHAN HERMONY,)

10 Defendants.)
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16 Videotaped Deposition of
17 NATHANIEL ROTH
18 Monday, November 14, 2022
19 9:02 a.m. Israel Standard Time
20
21
22
23

24 Job No.: 5550039

25 Reported by: BRENDA MATZOV, CSR NO. 9243

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| Page 2 | Page 4 |
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| <p>1 UNITED STATES DISTRICT COURT 2 SOUTHERN DISTRICT OF NEW YORK 3 _____ 4) 5 SPECTRUM DYNAMICS MEDICAL) 6 LIMITED,) 7 Plaintiff,) 8) Case No.: 9 vs.) 18-CV-11386(VSB) 10) 11 GENERAL ELECTRIC COMPANY, GE) 12 HEALTHCARE, INC., GE MEDICAL) 13 SYSTEMS ISRAEL LTD., JEAN-PAUL) 14 BOUHNIAK, SERGIO STEINFELD,) 15 ARIE ESHCO and NATHAN HERMONY,) 16) 17 Defendants.) 18 _____) 19) 20) 21) 22) 23) 24) 25)</p> <p>13 ** HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY **</p> <p>16 Videotaped deposition of NATHANIEL ROTH, 17 taken in the above-entitled cause pending in the 18 United States District Court, Southern District 19 of New York, before BRENDA MATZOV, CSR NO. 9243, 20 at Spectrum Dynamics, 22 Bareket Street, Caesarea, 21 Israel, on Monday, the 14th day of November, 2022, 22 at 9:02 a.m. Israel Standard Time. 23 24 25</p> | <p>1 APPEARANCES (Continued): 2 ALSO PRESENT: 3 AMY KATZ, Videographer 4 LINA MYKYTCHUK, Assistant Videographer (a.m. session) 5 6 EDAN MATZOV, Assistant Videographer (p.m. session) 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> |
| Page 3 | Page 5 |
| <p>1 APPEARANCES: 2 FOR PLAINTIFF: 3 FISH & RICHARDSON, PC 4 By: ADAM J. KESSEL, ESQ. 5 One Marina Park Drive 6 Boston, Massachusetts 02210 7 (617) 542-5070 8 kessel@fr.com 9 10 FISH & RICHARDSON, PC 11 By: TAYLOR M. REEVES, ESQ. 12 222 Delaware Avenue 13 17th Floor 14 Wilmington, Delaware 19801 15 (302) 652-5070 16 reeves@fr.com 17 18 FOR DEFENDANTS: 19 THOMPSON HINE, LLP 20 By: JEFFREY C. METZCAR, ESQ. 21 Discovery Place 22 10050 Innovation Drive 23 Suite 400 24 Dayton, Ohio 45342 25 (937) 443-6600 jeff.metzcar@thompsonhine.com</p> <p>18 THOMPSON HINE, LLP 19 By: JESSE L. JENIKE-GODSHALK, ESQ. 20 (partial) 21 312 Walnut Street 22 Suite 2000 23 Cincinnati, Ohio 45202 24 (513) 352-6700 25 jesse.jenike-godshalk@thompsonhine.com</p> | <p>1 INDEX 2 WITNESS 3 Nathaniel Roth 4 5 EXAMINATION PAGE 6 By Mr. Metzcar 13, 340 7 By Mr. Kessel 339 8 9 (The exhibits were pre-marked 10 prior to the proceedings, apart from 11 Exhibit 750, and Exhibit 342, which 12 was marked as a duplicate.) 13 14 E X H I B I T S 15 NUMBER DESCRIPTION INTRODUCED 16 Exhibit 725 United States Patent No. 6,744,053 Entitled 17 "PET Camera with Individually Rotatable Detector Modules 18 and/or Individually Movable Shielding Sections," Dated 19 June 1, 2004 (GE_SDM_00061706 to 00061720) 105 20 21 Exhibit 726 Document Entitled "The Design of a High-Resolution Transformable Whole-Body 22 PET Camera," Published Date October 2002 23 (GE_SDM_00794694 to 00794699) 129 24 25</p> |

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| <p style="text-align: right;">Page 42</p> <p>1 It's here? No.</p> <p>2 Q. Well, this is the e-mail that Mr. Smith</p> <p>3 sent to him.</p> <p>4 A. Aah.</p> <p>5 Q. My question is: Do you know whether</p> <p>6 Mr. Zilberstien responded to Mr. Smith in another</p> <p>7 e-mail?</p> <p>8 A. I don't know.</p> <p>9 Q. Or perhaps by telephone?</p> <p>10 A. I don't know.</p> <p>11 Q. Okay. Should I ask Mr. Zilberstien</p> <p>12 whether or not he responded to Mr. Smith?</p> <p>13 MR. KESSEL: Objection.</p> <p>14 THE WITNESS: I don't know.</p> <p>15 BY MR. METZCAR:</p> <p>16 Q. Okay. Did Mr. Zilberstien forward</p> <p>17 Mr. Smith's e-mail or the attached '597 patent</p> <p>18 to anyone else at Spectrum Dynamics besides</p> <p>19 you?</p> <p>20 A. I believe information related to</p> <p>21 patent generally comes to me.</p> <p>22 Q. Okay. You don't know whether --</p> <p>23 you can't know whether he sent it to anyone</p> <p>24 else, can you?</p> <p>25 A. There -- there's nobody else to send</p> | <p style="text-align: right;">Page 44</p> <p>1 full-body SPECT imaging systems, do you</p> <p>2 recall that he forwarded those to you?</p> <p>3 A. I think so.</p> <p>4 Q. Okay. Do you know whether he</p> <p>5 also forwarded those to other individuals,</p> <p>6 such as Gilad Yoeli?</p> <p>7 A. I believe he did on -- at least</p> <p>8 on a specific occasion.</p> <p>9 Q. Okay. So we're -- we're -- we're</p> <p>10 aware of situations in which Mr. Zilberstien,</p> <p>11 upon learning of GE patents or published</p> <p>12 patent applications, has, in fact, sent</p> <p>13 them to people other than just you; right?</p> <p>14 A. This -- again, this was a specific</p> <p>15 situation. Most of the time Yoel Zilberstien</p> <p>16 was sending patent to me for reviewing to</p> <p>17 understand the technical side. Gilad Yoeli</p> <p>18 is on the financial side. I -- I believe it</p> <p>19 will be difficult for him.</p> <p>20 Q. Okay. But you can't tell me for</p> <p>21 sure, can you, whether or not Mr. Zilberstien</p> <p>22 forwarded this '597 patent to someone else at</p> <p>23 Spectrum or discussed it with someone else at</p> <p>24 Spectrum, can you?</p> <p>25 MR. KESSEL: Objection.</p> |
| <p style="text-align: right;">Page 43</p> <p>1 it to.</p> <p>2 Q. Does Mr. Zilberstien answer to anyone</p> <p>3 else at the company?</p> <p>4 MR. KESSEL: Objection to form.</p> <p>5 THE WITNESS: Can you repeat the</p> <p>6 question?</p> <p>7 BY MR. METZCAR:</p> <p>8 Q. Sure.</p> <p>9 Does Mr. Zilberstien report to anyone</p> <p>10 else at the company who is, for example, above</p> <p>11 him?</p> <p>12 A. I -- I don't remember at that time</p> <p>13 if he was general manager. So if there was</p> <p>14 somebody above him, I don't -- I don't know.</p> <p>15 Q. When Mr. Zilberstien learned of</p> <p>16 other GE patents and patent applications,</p> <p>17 did he forward all of those to you?</p> <p>18 MR. KESSEL: Objection.</p> <p>19 THE WITNESS: I think "all" is a</p> <p>20 pretty strong word. But probably most of</p> <p>21 them.</p> <p>22 BY MR. METZCAR:</p> <p>23 Q. Okay. So, for example, in April</p> <p>24 of 2015, if Mr. Zilberstien learned of GE</p> <p>25 published patent applications relating to</p> | <p style="text-align: right;">Page 45</p> <p>1 THE WITNESS: What I can tell you</p> <p>2 is patents generally were sent to me to review</p> <p>3 mainly the technical aspect and content.</p> <p>4 BY MR. METZCAR:</p> <p>5 Q. I understand.</p> <p>6 But you can't tell me for certain</p> <p>7 whether or not he sent it to someone else</p> <p>8 or discussed it with someone else; right?</p> <p>9 MR. KESSEL: Objection.</p> <p>10 THE WITNESS: I can tell you</p> <p>11 whatever I know, that he was sending e-mails</p> <p>12 with patent content to me.</p> <p>13 BY MR. METZCAR:</p> <p>14 Q. I understand that -- that his --</p> <p>15 his standard practice would be to send them</p> <p>16 to you.</p> <p>17 But you can't tell me for certain</p> <p>18 whether or not he sent it to anyone else,</p> <p>19 can you?</p> <p>20 MR. KESSEL: Objection.</p> <p>21 THE WITNESS: I cannot respond to</p> <p>22 that question because --</p> <p>23 BY MR. METZCAR:</p> <p>24 Q. Well, you can't know that information</p> <p>25 can you?</p> |

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| <p style="text-align: right;">Page 218</p> <p>1 Q. Okay. And do you know the circumstances 2 under which Spectrum became aware of those seven 3 GE published patent applications? 4 MR. KESSEL: So let me, again, 5 caution the witness not to reveal attorney-client 6 communication. This is a "yes" or "no" question. 7 And I'll allow you to ask if it's -- 8 if it was under privileged circumstances but 9 not -- nothing more than that. 10 THE WITNESS: Can you repeat, please? 11 BY MR. METZCAR: 12 Q. Sure. 13 Are you aware of the circumstances 14 under which Spectrum Dynamics became aware 15 of those seven -- at least seven GE published 16 patent applications by no later than April 2015? 17 The circumstances. 18 A. April? Circumstance -- circumstances, 19 you mean by e-mail or by -- 20 Q. Yeah. Who -- 21 A. -- other means? 22 Q. -- learned of it? How did you -- how 23 did you get it? 24 A. Yeah. So I -- I prepared that as part 25 of this question that you asked us.</p> | <p style="text-align: right;">Page 220</p> <p>1 Do you -- do you understand he's with 2 Redlan? 3 A. Yes. He -- he was a supplier for our 4 CZT models. 5 Q. Okay. And that's "modules." 6 A. "Modules." Sorry. It's my accent. 7 Q. Uh-huh. It's fine. 8 A. Supplier of CZT modules. 9 Q. Okay. And -- and are you aware that -- 10 that he forwarded GE published patent applications 11 to Yoel Zilberstien? 12 A. Yes. He was sending to Yoel Zilberstien. 13 Q. Okay. Did you ever have a conversation 14 with Mr. Zilberstien regarding the published patent 15 applications that Mr. Bindley had sent to him? 16 A. So you mean he -- do you mean this 17 application, the '704? 18 Q. No. I'm sorry. 19 The -- the applications that Mr. Bindley 20 sent to Mr. Zilberstien in 2015, did -- did you 21 ever have a discussion with Mr. Zilberstien 22 regarding those published patent applications? 23 A. I don't remember. I don't -- I don't 24 remember. 25 Q. Okay. So you don't recall whether you</p> |
| <p style="text-align: right;">Page 219</p> <p>1 Q. Okay. Can you -- can you tell me what 2 the circumstances were? 3 A. Okay. So in 2010, we got this e-mail 4 from Rick from the first time with the '597 -- 5 Q. Uh-huh. 6 A. -- patent. 7 I -- I believe that, in 2013, at the 8 end of the due diligence, we got several patents 9 directly from GE, I think by e-mail -- 10 Q. Okay. 11 A. -- with, again, I think this patent 12 and others. 13 Then 2015 -- so I cannot tell you 14 till April. But there were several -- I mean, 15 several mails during that year's tree [sic], 16 during 2015, sent by Glenn -- it's another 17 supplier -- with some e-mails, sometime one, 18 sometime two, or something like that. 19 Q. Uh-huh. 20 A. And that's it for -- till 2015. 21 Q. Okay. So you mentioned Glenn. 22 Mr. Glenn Bindley? 23 A. Glenn -- Glenn Bindley. 24 Q. And you said he was with a -- with 25 a supplier.</p> | <p style="text-align: right;">Page 221</p> <p>1 ever discussed the contents of those applications 2 with him? 3 A. I don't remember that we had a discussion. 4 I don't remember that. 5 Q. Did he ever forward the applications 6 to you? 7 A. So I -- I told you that generally 8 that's what happened. 9 Q. Yes. 10 A. When there's some patent review, it 11 was sent to me for review. So maybe. I don't 12 remember. 13 Q. Okay. So Spectrum's CZT supplier 14 forwards a series of GE published patent 15 applications to Mr. Zilberstien in early 2015. 16 And typically he would forward those on to you 17 for review. 18 Do you know whether he sent them to 19 you? 20 A. I don't remember. 21 Q. Have you looked through your records 22 to see whether he forwarded them to you? 23 A. No. I -- I don't remember exactly. 24 Q. Okay. Do you have any idea whether 25 they were directed to full-body or whole-body</p> |